

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY RIFLE & PISTOL
CLUBS, INC., BLAKE ELLMAN, and MARC
WEINBERG,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official capacity as
Attorney General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity as
Superintendent of New Jersey Division of
State Police, RYAN MCNAMEE, in his official
capacity as Chief of Police of the Chester
Police Department, and JOSEPH MADDEN, in
his official capacity as Chief of Police of the
Park Ridge Police Department,

Defendants.

MARK CHEESEMAN, TIMOTHY CONNOLLY,
and FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official capacity as
Attorney General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity as
Superintendent of New Jersey Division of
State Police, CHRISTINE A. HOFFMAN, in her
official capacity as Acting Gloucester County
Prosecutor, and BRADLEY D. BILLHIMER, in
his official capacity as Ocean County
Prosecutor,

Defendants.

No. 18-cv-10507-RMB-JBD

No. 22-cv-04360-PGS-JBD

BLAKE ELLMAN, THOMAS R. ROGERS, and
ASSOCIATION OF NEW JERSEY RIFLE & PISTOL
CLUBS, INC.,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official capacity as
Attorney General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity as
Superintendent of New Jersey Division of
State Police, LT. RYAN MCNAMEE, in his
official capacity as Officer in Charge of the
Chester Police Department, and KENNETH J.
BROWN, JR., in his official capacity as Chief
of the Wall Township Police Department,

Defendants.

No. 22-cv-04397-PGS-JBD

JOINT MOTION FOR EXTENSION OF STAY

1. On July 30, 2024, Judge Sheridan issued a memorandum opinion and a judgment and order in this case. Dkts. 228, 229. Judge Sheridan held that N.J. Stat. 2C:39-1(w)'s ban on Colt AR-15 rifles violated the Second Amendment, that its ban on certain ammunition magazines did not, and that certain other parts of this act lay outside plaintiffs' challenge. Dkt. 228 at 4-6, 69.

2. Judge Sheridan *sua sponte* stayed "the effect of this Order and Judgment ... for thirty days." Dkt. 229 at 4.

3. Judge Sheridan retired, *see* Dkt. Entry "Remark" (Aug. 1, 2024), and the case has been reassigned to Chief Judge Bumb for all further proceedings, Dkt. 231.

4. Plaintiffs intend to file a motion for partial reconsideration pursuant to Federal Rule of Civil Procedure 60(b).

5. The parties have conferred and agreed to stipulate to extend the current stay of the effect of the Court's Order and Judgment pending resolution of plaintiffs' forthcoming motion for reconsideration.

6. Accordingly, the parties hereby move for such an extension of the stay Judge Sheridan initially entered and for a like stay of any judgment entered by this Court upon resolution of plaintiffs' forthcoming motion for reconsideration.

7. The parties' agreement is without prejudice to future motions to seek an extension of the stay.

8. A draft order reflecting this is respectfully attached.

Respectfully submitted,

s/Angela Cai
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August 8, 2024